

# Ballard Spahr LLP

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February 20, 2025

Hon. Jesse M. Furman  
United States District Judge  
United States District Court, Southern District of New York  
40 Foley Square, Room 2203  
New York, NY 10007

Re: *Cavalier et al. v. National Debt Relief, LLC – Case No. 1:24-cv-09194-JMF*

Dear Judge Furman,

We write on behalf of Defendant National Debt Relief, LLC (“NDR”) and Plaintiffs Dominique Cavalier and Justin Caffier (“Plaintiffs”) to advise you that the parties have reached a settlement in principle of Plaintiffs’ claims in this action. The parties anticipate submitting a stipulation for dismissal with prejudice within the next sixty (60) days.

NDR’s deadline to answer or otherwise respond to Plaintiffs’ Complaint is February 24, 2025, and the parties are currently scheduled to appear for an initial pretrial conference with the Court on March 12, 2025, at 9:00 a.m. In light of the parties’ settlement, and pursuant to Fed. R. Civ. P. 6(b) and Section 2(D) of your Individual Rules and Practices in Civil Cases, the parties request that all deadlines and conferences in this case be stayed by sixty (60) days to permit the parties an opportunity to finalize the terms of their settlement and submit their dismissal papers.

No party will be prejudiced by an extension of these matters. The parties have sought one extension of NDR’s response deadline previously in this case, which the Court granted. The parties agree that this request is being brought in good faith and not for the purpose of causing undue delay.

Thank you in advance for your consideration of this request.

Sincerely,

s/ Gregory Szewczyk  
BALLARD SPAHR LLP  
Gregory Szewczyk

*Attorney for Defendant, National Debt  
Relief LLC*

s/ Samuel R. Jackson  
CARNEY BATES & PULLIAM, PLLC  
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